

Stephen L. Simonton
Stephen L. Simonton, PC
1222 Eleventh Street
Cody, WY 82414
Phone: 307-587-7010
Telefax: 307-587-2746
simonton@wavecom.net
Wyo. State Bar # 4-1063
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

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|---|---|--------------------------------------|
| MARTIN CHAPARRO, and |) | |
| JAMES GOULD and ERIN GOULD, |) | |
| and ERIN GOULD as natural guardian |) | Civil Action No. 08 CV - 049B |
| for FRANK GOULD and |) | |
| JASMINE GOULD, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | |
| |) | |
| COLORADO CASUALTY INSURANCE |) | |
| COMPANY, |) | |
| |) | |
| Defendant. |) | |

***PLAINTIFFS' DESIGNATION OF DR. JEFFREY N. HANSEN
AS TREATING PHYSICIAN WITNESS***

In compliance with USDCtLR 83.6(d), the Order on Initial Pretrial Conference, Plaintiffs herewith designate Dr. Jeffrey N. Hansen, M.D. as a health care provider who may be called to express opinions in testimony at trial as to the care, treatments, examinations, testing, diagnoses and/or prognoses of the injuries to Plaintiff James F.

Gould proximately caused by and reasonably necessary for the treatment of injuries resulting from the vehicle crash which gave rise to this litigation. Dr. Hansen is affiliated with Powell Valley Health Care and his business address is 777 Avenue H, Powell, Wyoming, 82435, tel. # 307-754-2267.

Dr. Hansen has provided care for the wrist injury and ankle injury that Mr. Gould suffered in the collision of February 17, 2004. Despite diligent efforts, we have not yet been able to obtain Dr. Hansen's current CV, case list and schedule of fees and conditions. We initially called his office in the end of May to let him know we would be requesting this information. We followed up with a letter faxed on June 18, 2008. His office called back and said that Dr. Hansen would be providing the material immediately; however, Dr. Hansen was then called out of town on a family emergency and has been out of town for the last three weeks. His office staff has been unable to reach him and has been unable to locate the current CV and fee schedule. They are continuing their attempts to reach Dr. Hansen to obtain this information. We will provide the information as soon as we receive it.

If called, Dr. Hansen will testify to his care, examinations, surgery and treatments, diagnoses and prognoses as foundation for the opinions of Plaintiffs other experts. A summary of Dr. Hansen's examinations, surgery, treatment and opinions is attached hereto as Plaintiff's Exhibit 167. Dr. Hansen may be asked to testify that the wrist surgery was reasonably necessary and proper treatment for an injury caused by the collision of

February 17, 2004, may be asked to render his opinion that Mr. Gould's ankle injury from the February 17, 2004 collision will require surgery, and may be may be asked to use his operating report to explain the surgery that was performed on Mr. Gould's wrist on August 24, 2005. Exhibit 168 hereto is Dr. Hansen's Operative report for that of surgery. Dr. Hansen may be asked to use explain the procedures in the report and to use visual aids to illustrate or explain the procedures and consequences to the jury. The visual aids may include standard anatomical illustrations and models as well as the applicable imaging (such as X-rays and MRIs). Dr. Hansen , and may be asked to discuss the need for surgery on Mr. Gould's ankle.

Dated: this 16th day of July, 2008.

/s/Stephen L. Simonton

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Wyo. Bar No. 4-1063
Stephen L. Simonton, PC
simonton@wavecom.net
1222 - 11th Street
Cody, Wyoming 82414
(307) 587-7010
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Stephen L. Simonton, hereby certify that on this 16th day of July, 2008, I served a true and correct copy of the foregoing Designation by filing it with the Clerk of Court using the CM/ECF system which will send notification to counsel for the Defendant at the following e-mail address and also mailed by U.S. Mail:

John A. Coppede, Hickey and Evans

jcoppede@HickeyEvans.com

John M. Walker

jwalker@-hickeyevans.com

Howard Victor Scotland, III

hscotland@hickeyevans.com

HICKEY & EVANS, LLP

1800 Carey Ave, Ste 700

PO Box 467

Cheyenne, WY 82003-0467

Ph: (307) 634-1525

/s/Stephen L. Simonton

Stephen L. Simonton

simonton@wavecom.net

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